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March 31, 2023

## Via ECF & Electronic Mail

Hon. J. Lorna G. Schofield United States District Court Southern District of New York 500 Pearl Street New York, New York 10007

Re: Coleman v. 26 Motor Corp., et al.

1:21-cv-10537

Dear Judge Schofield,

With the consent of Plaintiff's counsel I write on behalf of Defendants in the above referenced matter concerning Plaintiff's counsel's March 21, 2023, correspondence (docket #33) wherein Plaintiff requested that Your Honor reinstate the arbitration previously ordered in this action, or, in the alternative, enter an Order prohibiting Defendants from seeking to compel arbitration in the future and reinstating the litigation.

Following earlier communications, yesterday evening Plaintiff's counsel emailed the undersigned a five-point proposal that would result in the parties' voluntary engagement in this Court's ADR program. That in turn led to direct settlement discussions between counsel today. Those negotiations have just begun but the potential for a final amicable resolution of this matter in the near future warrants further direct negotiation to which counsel are now committed.

Accordingly, counsel for all parties respectfully request that Your Honor extend the time for Defendants to file a formal response to Plaintiff's March 21, 2023, correspondence for one week until April 7, 2023.

Thank you for your consideration of this request and we look forward to hearing from you shortly

Very truly yours,

H Nicholas Goodman

cc: Cooper Ellenberg (via ECF)
Daniel Schlanger (via ECF)